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December 30, 2014

Via ECF

Hon. George B. Daniels
United States District Judge
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Sokolow v. Palestine Liberation Organization et al.*
04-CV-397(GBD)(RLE)

Dear Judge Daniels:

I write to follow up on the letter dated December 23, 2014 from my partner Mark Rochon concerning the fact witnesses Defendants intend to call and their anticipated testimony. See DE 677. Since that letter was submitted, defense counsel have learned that two of the witnesses disclosed in that letter, Salam Fayyad and Afif Safieh, will not be testifying at trial. Mr. Fayyad and Mr. Safieh are no longer employed by the PA or PLO, and the PA and PLO are not able to arrange their attendance at trial. As substitutes, the PA and PLO instead intend to call as live witnesses Shawqi Issa, who is the current PA Minister of Social Affairs and Minister of Agriculture, and Hanan Ashrawi, who is a member of the PLO Executive Committee. They will offer the testimony previously disclosed for Mr. Fayyad and Mr. Safieh in Mr. Rochon's letter of December 23, 2014 and the deposition transcripts of Mr. Fayyad and Mr. Safieh which were previously produced in this matter. As part of this testimony, Mr. Issa and Ms. Ashrawi will testify concerning the rationale for the payments which the court has deemed admissible, and rebut the plaintiffs' claim that these payments are a reward for terrorism. Similar testimony was previously disclosed in Mr. Rochon's letter of December 23, 2014 for Suleiman al-Deek, Radwan El Hilo and Jawad Amawi, and in the previously produced declaration of Mr. al-Deek and deposition transcripts of Mr. Amawi. Defendants also reserve the right to offer the previously disclosed designations of the depositions of Mr. Fayyad and Mr. Safieh.

Sincerely,

A handwritten signature in blue ink that appears to read "B. A. Hill".

Brian A. Hill